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In the Supreme Court of the United States

OCTOBER TERM, 1946

No. 558

STANLEY W. TAYLOR,
Petitioner,

vs.

PAUL A. PORTER, Price Administrator, Office of Price Administration,
Respondent.

On Petition for Writ of Certiorari to the United States Emergency Court of Appeals

Motion for Appointment of Counsel and for Other Relief

STANLEY W. TAYLOR,
1201 Fulton St.
San Francisco (17), Calif.
Petitioner in Propria Persona.

PARKER PRINTING COMPANY, 545 SANSOME STREET, SAN FRANCISCO

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To the Honorable Frederick Moore Vinson, Chief Justice of the United States, and to the Honorable Associate Justices of the Supreme Court of the United States:

Comes now Stanley W. Taylor, your petitioner in the above entitled cause, and respectfully moves the Court:

1. That this Honorable Court appoint counsel, in whom the Court may have confidence, to represent your peti-

tioner herein in the event that the petition for certiorari is opposed and it appears to the Court that petitioner should have counsel to adequately present his cause.

2. That your petitioner be not required to print the record herein, or that he be required to print only such portions thereof as the Court or the Honorable Clerk thereof may deem absolutely necessary.

3. That in the event this Honorable Court does appoint counsel, such time as to the Court may seem just and proper be allowed such counsel to study the case and to thereafter amend the Petition herein or add thereto or file a brief in support thereof or to take such other steps in furtherance of petitioner's cause as such counsel may deem appropriate.

4. That petitioner be permitted to file twenty copies of his printed *Exhibit to Petition*, the rules of the Court notwithstanding. (If additional copies are desired it is possible that they may be obtained from the Clerk of the Emergency Court.)

In support of his motion petitioner respectfully states and represents as follows:

I.

The above entitled cause constitutes your petitioner's defense on constitutional grounds in the criminal case of *U. S. v. Taylor*, No. 27815-S, U.S. Dist. Ct. No. Dist. Calif., So. Div. (Tr. 2-3).

Your petitioner, while not a pauper, has nevertheless been compelled to represent himself herein and in the proceedings precedent hereto by reason of the fact that he cannot afford to employ counsel.

Your petitioner fell in disfavor with respondent as a result of an earlier protest filed by petitioner on August 27, 1942, and since November 9, 1942 has been restrained by respondent and prevented by respondent from collecting what petitioner deems to be the proper rentals under the regulation in question (Tr. 78-80, 184 186). By reason of the foregoing, petitioner was compelled to operate his property at a loss for two years and petitioner and his wife were compelled to provide their own services in such operation without compensation (Tr. 82). Expenditures and losses imposed upon petitioner by respondent, in connection with the litigation here involved, exceeded $12,800.00 on August 1, 1944, the date of filing of the protest precedent hereto. Petitioner has also been compelled to devote months of time and personal effort in connection with such litigation (Tr. 200).

As a result of the above conditions petitioner has been compelled to go heavily into debt in order that he may attend to the necessary expenses involved in his defense.

II.

The record in the instant case comprises approximately 2000 pages of which 359 pages (exclusive of the opinion) are already printed in form acceptable in this Court (Tr. 1-359). Petitioner has, throughout the proceedings, endeavored to obtain stipulations as to facts so as to avoid unnecessary proof and affirms that the record is unnecessarily long because of the refusal of respondent to consider any stipulation of facts or of documents (Tr. 57, 250, 425-428).

1600 pages of evidence, documentary proof, and exhibits, originally filed by petitioner in the protest proceedings and

officially admitted as evidence both before the administrator and in the Emergency Court, have not been filed in this Court with the Certified Transcript. This is a result of the fact that the Emergency Court over the objection of petitioner permitted respondent to file so few copies of such documents and exhibits that upon application of petitioner the Clerk of the Emergency Court was unable to provide a complete transcript of this evidence (Petition, Appendix (1), Tr. 421-429).

Your petitioner believes that in view of the undisputed state of the record (Tr. 1-359) there is enough evidence there set forth to disclose to this Honorable Court that certiorari should be granted. In any case it appears to petitioner that it would be an injustice to compel petitioner to now print the remainder of the record under the circumstances above stated.

Your petitioner believes (though he may be over-optimistic) that when and if certiorari is granted respondent will be more amenable in the matter of stipulating on the record.

Petitioner is able to supply up to twenty mimeographed copies of the complaint (Tr. 361-413) in size and form similar to the one in the certified transcript and is also able to supply some few printed volumes of other exhibits. In the case of some exhibits, however, petitioner has only one copy.

It is respectfully suggested that the settling of the record be deferred until after the Court has acted upon the Petition.

III.

By reason of the complexity of the case and the many issues involved, it would obviously take some time for

counsel unfamiliar with the case to study and digest it. Thus if counsel is appointed by this Court, it is respectfully suggested that thirty days be allowed such counsel to amend the Petition herein or to take such other action as may be appropriate.

IV.

Petitioner believes that his *Exhibit to Petition* will be useful to the Court in its consideration of the instant case, but petitioner is unable to provide 40 copies.

Dated, San Francisco, California,
September 28, 1946.

Respectfully submitted,

STANLEY W. TAYLOR
1201 Fulton St.
San Francisco (17), Calif.
Petitioner in Propria Persona